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States Government

Department of Energy

Memorandum

MAY 8 7 28 AM '91

Rocky Flats Office

EG&G
ROCKY FLATS PLANT
CORRESPONDENCE CONTROL

MAY 16 1991

ERD:SG:3449

EPA Superfund Innovative Technology Evaluation Demonstration

David P. Simonson, Assistant Manager for Environmental Management

In a meeting with EPA Region VIII (EPA) and the Colorado Department of Health (CDH), the proposed EPA Superfund Innovative Technology Evaluation (SITE) demonstration came up as a topic of discussion. EPA received a response from SITE concerning whether or not a public comment period was required for the SITE demonstration at Rocky Flats. SITE maintains that a public comment period must occur locally based on National Contingency Plan guidance.

EPA is concerned about having to conduct public comment where there is no mechanism for changing the demonstration based upon public comment received. EPA is further concerned about public perception about the public comment for this demonstration when there are no plans for any public comment on the various treatability tests to be conducted/demonstrated under the Sitewide Treatability Study Plan.

In addition, concerns have been expressed about whether or not the TechTran technology is appropriate or can be successfully demonstrated as proposed. To date we are basing our participation on the verbal assurances from TechTran and SITE that the technology is appropriate.

As a result of these concerns, EPA and CDH have identified four items they would like addressed before they will support our participation in the SITE demonstration. These are:

1. RFO takes the lead in the local Public Comment for the EPA SITE demonstration.
2. That TechTran sends sufficient information on their process so that it can be evaluated against the proposed demonstration.
3. That a technical evaluation of the TechTran process concludes that it is an appropriate process for the Rocky Flats concerns and the demonstration will have meaningful results.
4. As part of the technical evaluation of the TechTran process, the amounts and types of waste residuals expected will be considered.

Reviewed for Addressee
Corres. Control RFP

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ADMIN RECORD

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A-5W 001745

There is another issue surfacing from EG&G. EG&G has tentatively estimated that they need an additional \$250,000 funding to coordinate and provide oversight of the SITE demonstration. EG&G will also be requesting funding for Office of Technology Development (OTD) partially-funded projects such as the Integrated Demonstrations and the Program Research Development Announcement (PRDA). Since there are only limited funds available for non-InterAgency Agreement (IAG) activities, they need to be prioritized based upon potential benefit to the Environmental Restoration (ER) program. The currently identified non-IAG activities are as follows:

The Plutonium in Soils Cleanup Integrated Demonstration hosted by Nevada.

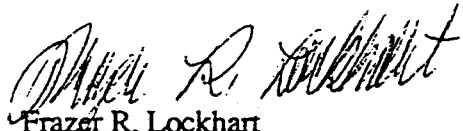
The PRDA for soil washing and three-dimensional characterization programs coordinated by Oak Ridge.

The VOC in Soils and Water Arid Site Integrated Demonstration hosted by Hanford.

The EPA SITE TechTran demonstration.

The amount of the funding requested by EG&G raised an additional issue. Because of the amount greater than \$250,000 we are required to get approval from Headquarters (EM-45) for this activity.

The four EPA and CDH concerns need to be addressed by SITE and PRC, their consultant. The EG&G funding issue, approval by EM-45, technical merit and priorities will be addressed by DOE/ERD and EG&G/Remedial Programs. The issue of the public comment will be addressed by DOE Public Affairs and EG&G Community Relations. We suggest that a meeting be held in the near future to address the items identified in this memo.


Frazier R. Lockhart
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